



February 9, 2022

Via ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

*Re: In re: New York City Policing During Summer 2020 Demonstrations,
No. 20-CV-8924
This Filing is Related to ALL CASES*

Dear Judge Gorenstein:

We write on behalf of all Plaintiffs in the above-referenced matter in response to the Court's order on February 7, 2022 (ECF No. 383) directing Plaintiffs to supply proposed orders to effect the relief requested in the unopposed letters submitted to the Court previously at ECF Nos. 370 and 374. Two proposed orders are attached to this letter. We are also emailing a Microsoft Word version of both proposed orders to your Chambers today for the Court's convenience.

Respectfully submitted,

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION

THE LEGAL AID SOCIETY

By: s/Jessica Perry

Jessica Perry
Molly K. Biklen
Daniel R. Lambright
Robert Hodgson
Lisa Laplace
Christopher T. Dunn
125 Broad Street, 19th Floor
New York, NY 10004
(212) 607-3300
jperry@nyclu.org

By: s/Corey Stoughton

Corey Stoughton
Jennvine Wong
Rigodis Appling
199 Water Street
New York, NY 10038
(212) 577-3367
cstoughton@legal-aid.org

Attorneys for the Payne Plaintiffs

Cc: All counsel of record
Encl.